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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHEILA MILLER, individually,  
  
Plaintiff,  
  
vs.

LOVE'S TRAVEL STOPS & COUNTRY  
STORES, INC., an Oklahoma Corporation;  
GRANT THORNTON, LLP, a Foreign  
Limited-Liability Partnership; and DOES I-X;  
and ROE BUSINESS ENTITIES XI-XX,  
inclusive.

Defendants

CASE NO.: 2:24-cv-02410

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DEADLINES**  
  
**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of record, that pursuant to Local Rule 26-1(b) **the current discovery deadlines be extended by thirty (30) days.**

**I.**

**DISCOVERY COMPLETED TO DATE**

1. The parties have conducted the FRCP 26.1 Early Case Conference.
2. Plaintiff has produced her Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a).
3. Defendant has produced its Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a).
4. Defendant propounded First Set of Interrogatories to Plaintiff.



5. Defendant propounded First Set of Requests for Production to Plaintiff.
6. Defendant propounded First Set of Request for Admissions to Plaintiff.
7. Plaintiff served Responses to Defendant's First Set of Interrogatories.
8. Plaintiff served Responses to Defendant's First Set of Requests for Production.
9. Plaintiff served Responses to Defendant's First Set of Request for Admissions.
10. Plaintiff propounded First Set of Interrogatories to Defendant.
11. Plaintiff propounded First Set of Requests for Production to Defendant.
12. Plaintiff propounded First Set of Request for Admissions to Defendant.
13. Defendant served Responses to Plaintiff's First Set of Interrogatories.
14. Defendant served Responses to Plaintiff's First Set of Requests for Production.
15. Defendant served Responses to Plaintiff's First Set of Request for Admissions.
16. The parties conducted Plaintiff's deposition.

## II.

### **DISCOVERY THAT REMAINS TO BE COMPLETED**

1. Deposition of Defendant Love's Travel Stops & Country Stores, Inc. 30(b)(6) witness(es).
2. Deposition(s) of Plaintiff's treating physicians.
3. Deposition of other percipient witnesses.
4. Initial expert disclosures.
5. Rebuttal expert disclosures.
6. Depositions of experts.
7. Additional written discovery (if necessary).
8. Any remaining discovery the parties deem relevant and necessary as discovery

continues.

## III.

### **REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES**

LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be



made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3. If the stipulation is made less than twenty-one (21) days before the expiration of a deadline, the parties must show a good cause exist. A request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect.

A request to extend unexpired deadlines in the scheduling order must be premised on a showing of good cause. Fed. R. Civ. P. 16(b)(4); Local Rule 26-3. The good cause analysis turns on whether the subject deadlines cannot reasonably be met despite the exercise of diligence. *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992).

The parties respectfully submit, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. Plaintiff's counsel had a personal emergency that occurred on May 9, 2025, and Plaintiff's counsel has been back and forth visiting the hospital every day since then. This Request for an extension of time is not sought for any improper purpose other purpose of delay. Based on the foregoing, both Plaintiff and Defense counsel are requesting that the discovery deadlines be extended by thirty (30) days.

#### **Extension or Modification of The Discovery Plan and Scheduling Order.**

LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3. If the stipulation is made less than twenty-one (21) days before the expiration of a deadline, the parties must show a good cause exist.

<b>Discovery Deadline</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Motion to Amend/Add Parties	April 22, 2025	Closed
Initial Expert Disclosures	May 22, 2025	June 23, 2025
All Rebuttal Expert Disclosures	June 20, 2025	July 21, 2025
Discovery Cut-Off Date	July 21, 2025	August 20, 2025
Dispositive Motions	August 20, 2025	September 19, 2025

The parties represent this Stipulation is sought in good faith and not interposed for delay or any other improper purpose.

1 DATED this 22nd day of May, 2025.

DATED this 22nd day of May, 2025.

2 **PACIFIC WEST INJURY LAW**

**RESNICK & LOUIS, P.C.**

3  
4 /s/ Kirill V. Mikhaylov  
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10  
11 **ORDER**

12 **IT IS SO ORDERED.**

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15 **UNITED STATES MAGISTRATE JUDGE**

16 DATED: May 23, 2025

